## Case 1:13-cr-00028-AJN Document 101 Filed 05/28/21

Kramer Levin

Darren LaVerne
Partner
T 212.715.9190
F 212.715.8190
dlaverne@kramerlevin.com

1177 Avenu New York, N T 212.715.9

DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 6/1/21

USDC SDNY

**F** 212.715.8000

May 28, 2021

## Via ECF

The Honorable Alison J. Nathan United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: <u>United States v. Pedro Lugo</u>, 13-CR-00028 (AJN)

Dear Judge Nathan:

On behalf of defendant Pedro Lugo, and with the consent of the government and Probation, we respectfully request that the Court adjourn the status conference in this VOSR matter, presently scheduled for June 2, 2021, to a date in late July 2021.

The parties first appeared for a conference on October 1, 2020. At that time, we noted that the violation alleged in Probation's VOSR report is the subject of a criminal proceeding that remains pending in state court, and that any resolution of the former could prejudice Mr. Lugo's ability to defend the latter. Since then, we understand that the parties in the state case have been continuing to work towards a disposition. The next state court date is June 10, 2021.

Mr. Lugo remains at liberty, subject to the terms of a \$50,000 bond and pretrial supervision, including by electronic monitoring. This is our fourth request for an adjournment in light of the state proceedings, the first having been granted on November 16, 2020, the second on February 1, 2021, and the third on May 3, 2021.

SO ORDERED.

adjourned to July 23, 2021 at 11:00 A.M.

The conference is

The Honorable Alison J. Nathan May 28, 2021



We thank the Court for its consideration.

Respectfully submitted,

/s/ Darren A. LaVerne
Darren A. LaVerne
Leah S. Friedman
Harry P. Morgenthau

KRAMER LEVIN NAFTALIS & FRANKEL LLP 1177 Avenue of the Americas New York, NY 10036 Telephone: 212.715.9190 Counsel for Pedro Lugo

cc: AUSA Christopher DiMase
U.S. Probation Officer Marcelo Bravo